

Presented to the Court by the foreman of the  
Grand Jury in open Court, in the presence of  
the Grand Jury and FILED in the U.S.  
DISTRICT COURT at Seattle, Washington.

December 4 2019  
WILLIAM M. McCOOL, Clerk  
By [Signature] Deputy

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

DOMINGO RAMIREZ RODRIGUEZ,

Defendant.

**CR 19-249-RSL**

**INDICTMENT**

The Grand Jury charges that:

**COUNT 1**

**(Conspiracy to Distribute Heroin)**

Beginning at a time unknown and continuing until on or about February 7, 2019, in King County, within the Western District of Washington, and elsewhere, DOMINGO RAMIREZ RODRIGUEZ, and others known and unknown, did knowingly and intentionally conspire to distribute heroin, a substance controlled under Title 21, United States Code, Section 812, Schedule I.

With respect to DOMINGO RAMIREZ RODRIGUEZ, his conduct as a member of the conspiracy charged in Count 1, which includes the reasonably foreseeable conduct of other members of the conspiracy charged in Count 1, involved one kilogram or more

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1 of a substance containing a detectable amount of heroin, in violation of Title 21, United  
2 States Code, Section 841(b)(1)(A).

3 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A),  
4 and 846.

5 **COUNT 2**

6 **(Possession of Heroin with Intent to Distribute)**

7 On or about February 7, 2019, in King County, within the Western District of  
8 Washington, and elsewhere, the defendant DOMINGO RAMIREZ RODRIGUEZ,  
9 knowingly and intentionally possessed, and did aid and abet the possession of, with intent  
10 to distribute, heroin, a substance controlled under Title 21, United States Code, Section  
11 812, Schedule I.

12 The Grand Jury further alleges that the offense involved one kilogram or more of a  
13 mixture or substance containing a detectable amount of heroin.

14 The Grand Jury further alleges that this offense was committed during and in  
15 furtherance of the conspiracy charged in Count 1, above.

16 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A),  
17 and Title 18, United States Code, Section 2.

18 **COUNT 3**

19 **(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)**

20 On or about February 7, 2019, in King County, within the Western District of  
21 Washington, and elsewhere, DOMINGO RAMIREZ RODRIGUEZ did possess, and did  
22 aid and abet the possession of, a firearm, to wit: one Ruger 9E 9 mm handgun, serial  
23 number 337-42738, in furtherance of a drug trafficking crime, to wit: Conspiracy to  
24 Distribute Controlled Substances, as charged in Count 1 above, and Possession of Heroin  
25 with Intent to Distribute, as charged in Count 2 above.

26 All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.

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Indictment

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**ASSET FORFEITURE ALLEGATION**

The allegations contained in Counts 1–3 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture.

**Counts 1–2**

Pursuant to Title 21, United States Code, Section 853(a), upon conviction of either of the offenses alleged in Counts 1–2 of this Indictment, the defendant, DOMINGO RAMIREZ RODRIGUEZ, shall forfeit to the United States any property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as the result of that offense, and also shall forfeit any of the defendant's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, that offense, including but not limited to a judgment for a sum of money representing the property described in this paragraph.

**Count 3**

Pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), upon conviction of the offense alleged in Count 3 of this Indictment, the defendant, DOMINGO RAMIREZ RODRIGUEZ, shall forfeit to the United States any firearms and ammunition involved or used in any knowing violation of Title 18, United States Code, Section 924.

**Substitute Assets**

If any of the above-described forfeitable property, as a result of any act or omission of the defendant,

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

1 it is the intent of the United States, pursuant to Title 21, United States Code, Section  
2 853(p) and Title 28, United States Code, Section 2461(c), to seek the forfeiture of any  
3 other property of the defendant, up to the value of the above-described forfeitable  
4 property.

5 A TRUE BILL:

6  
7 DATED: 4 December 2019

8 *Signature of the Foreperson redacted*  
9 *pursuant to the policy of the Judicial*  
10 *Conference of the United States*

11 FOREPERSON

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13  
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15  
16 BRIAN T. MORAN  
United States Attorney

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19  
20 VINCENT T. LOMBARDI  
Assistant United States Attorney

21  
22  
23  
24 NICHOLAS MANHEIM  
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